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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT TACOMA**

OCEANCONNECT MARINE UK LTD.,

Plaintiff,

v.

M/V COREFORTUNE OL (IMO No. 9511014), its
engines, tackle and apparel, etc.

Defendant *IN REM*.

IN ADMIRALTY

No. 3:19-cv-06166

**EMERGENCY MOTION TO ISSUE
WARRANT FOR ARREST OF VESSEL**

15 Plaintiff OceanConnect Marine UK, Ltd. (hereinafter “Plaintiff” or “OceanConnect”)
16 respectfully moves this Court, pursuant to Fed. R. Civ. P. Supplemental Rule C (3) for
17 Admiralty or Maritime Claims and Asset Forfeiture Actions (“Supplemental Rule”) to
18 authorize the arrest of the vessel M/V COREFORTUNE OL, IMO No. 9511014 to enforce
19 Plaintiff’s maritime lien.

20 Supplement Rule C establishes the basis for the vessel arrest: “[a]n action in rem may
21 be brought: (a) [t]o enforce any maritime lien...” and “the court must issue an order directing
22 the clerk to issue a warrant for the arrest of the vessel or other property that is the subject of
23 the action.” Supplemental Rule C(1)(a) and C(3)(a). *See also* Local Admiralty Rule 116.

1 As established by Plaintiff's Verified Complaint and attached exhibits (Dkt. 1) and
2 the Declaration of Mary C. Butler, which are incorporated here by reference, Plaintiff holds a
3 maritime lien on the defendant vessel M/V COREFORTUNE OL, IMO 9511014, for
4 necessities Plaintiff provided to the vessel and for which no payment has been received.

5 DATED this 5th day of December, 2019.

6 LE GROS BUCHANAN & PAUL

7 s/ Eric R. McVittie

8 s/ Mary C. Butler

9 Eric R. McVittie, WSBA #20538

Mary C. Butler, WSBA #44855

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14 Marine UK Ltd.